

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO. 04-30066-MAP

SUSAN O'CONNELL,)
Plaintiff)
v.)
METROPOLITAN LIFE INS. CO.)
Defendant)

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PLAINTIFF'S REQUEST FOR FURTHER DISCOVERY

NOW comes the Plaintiff, Susan O'Connell, and pursuant to this court's August 24, 2004 Order Regulation Proceedings, requests that she be allowed further discovery. Specifically, the Plaintiff requests the authority to take the deposition of Gary Inman, Senior Disability Case Manager of the Defendant, MetLife.

As grounds thereon, the Plaintiff states that on October 7, 2004 she requested, through her attorney, further records from the Defendant. By that same communication, Plaintiff informed Defendant that she believed the record to be incomplete.

On November 4, 2004, Plaintiff received Defendant's Diary Review Report. This diary is in chronological order and consists of notes of various phone conversations (see attached). The deposition of Mr. Inman is necessary to clarify the meaning of various notes and notations contained in this document.

Wherefore, the Plaintiff requests this court to allow the said deposition in order to have a full and complete record for judicial review.

Respectfully Submitted,

THE PLAINTIFF

11-5-04

By:



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CERTIFICATE OF SERVICE

I, William G. Cullinan, Esq., hereby certify that on this 5 day of November, 2004, I caused a copy of the foregoing to be served on the defendants by mailing a copy of same postage prepaid, first class mail, to attorney of record: Johanna L. Matloff, Esq., CONN KAVANAUGH ROSENTHAL PEISCH & FORD, LLP, Ten Post Office Square, Boston, MA 02109

William G. Cullinan
WILLIAM G. CULLINAN